

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION**

|  |                          |
|--|--------------------------|
| CHARLES GOLBERT, et al., on behalf of )      |                          |
| themselves and a class of others similarly ) |                          |
| situated, )                                  | Case No: 18 C 8176       |
|  | )                        |
| Plaintiffs, )                                | Hon. Jeffrey I. Cummings |
|  | )                        |
| v. )   | Judge Presiding          |
|  | )                        |
| BEVERLY J. WALKER, et al., )                 | Hon. M. David Weisman    |
|  | )                        |
| Defendants. )                                | Magistrate Judge         |

**DEFENDANTS' UNOPPOSED MOTION  
TO EXTEND EXPERT DISCOVERY**

Defendants, for their unopposed motion to extend the expert discovery schedule for 21 days, state as follows:

1. On January 31, 2025, defendants filed an unopposed motion to extend the expert discovery schedule as follows: (a) defendants to disclose their expert(s) and expert report(s) by April 22, 2025; and (b) plaintiffs to depose defendants' expert(s) by June 6, 2025.<sup>1</sup> (Dkt. 326). The Court granted the motion and set a status hearing for May 15, 2025, and a joint status report by noon May 12, 2025. (Dkt. 328).
2. To engage an expert witness, the defendants are required to comply with state law pertaining to contracting with outside entities. This process, which involved necessary approvals by the Illinois Department of Children and Family Services, took a substantial amount of time, even with counsel for the defendants making their best efforts to expedite the contracting process. Under state law, the contract must be fully executed before work can begin for which payment can be made. The contract was requested on March 6, 2025, and it was fully executed on March 28, 2025. The time to complete the contracting process

---

<sup>1</sup> Defendants' motion for an extension of time was filed on April 15, 2025, and noticed for hearing on April 22, 2025, the Court's first available date.

and fully execute the contract delayed the expert's commencement of preparation of the report.

3. Granting a request for additional time is within the Court's discretion when the request is made with good cause prior to the original time deadline having expired. *See Fed. R. Civ. P. 6(b)(1)(A).* "Good cause" is the showing of a reasonable explanation as to why an approaching deadline cannot be met -- "Good cause comes into play in situations in which there is no fault—excusable or otherwise. In such situations, the need for an extension is usually occasioned by something that is not within the control of the movant." *Utah Republican Party v. Herbert*, 678 Fed. Appx. 697, 700-701 (10<sup>th</sup> Cir. 2017) (citations and quotations omitted).
4. Plaintiffs do not oppose defendants' request to extend the expert discovery schedule by 21 days in order to allow defendants to disclose their expert(s) and expert report(s) and to allow time for the expert(s)' depositions.

Wherefore, for the reasons set forth above, the defendants respectfully request that the Court grant their agreed motion and enter an order vacating the current expert discovery schedule (Dkt. 328) and extending expert discovery as follows: (a) defendants' expert disclosure(s) shall be served by May 13, 2025; (b) plaintiffs shall depose defendants' expert(s) by June 26, 2025; and (c) setting the dates for filing the parties' joint status report and the next status hearing, as determined by the Court.

Dated: April 15, 2024

Respectfully submitted,

/s/Barbara L. Greenspan  
Attorney for Defendants  
Barbara L. Greenspan  
Thomas J. Verticchio  
Vjolca Saliu  
Assistant Attorneys General  
115 S. LaSalle St.  
Chicago, Illinois 60603  
(312) 858-0412

**CERTIFICATE OF SERVICE**

The undersigned, an attorney, deposes and states that DEFENDANTS' UNOPPOSED MOTION TO EXTEND EXPERT DISCOVERY was served upon counsel of record via electronic ECF filing this 15<sup>th</sup> day of April 2025.

s/Barbara L. Greenspan  
Barbara L. Greenspan  
Assistant Attorney General  
115 S. LaSalle St.  
Chicago, Illinois 60603  
(312) 858-0412